

Address:	30 Camden Street and 67-72 Plender Street London NW1 0LG		2
Application Number:	2013/1969/P	Officer: Charles Thuaire	
Ward:	St Pancras & Somers Town		
Date Received:	05/04/2013		
Proposal: Redevelopment of 30 Camden Street to provide a 3-4 storey block for 14 'affordable' selfcontained flats (5x1bed, 5x2bed and 4x3bed) plus 7 carspaces behind Camden Studios. Redevelopment of 67-72 Plender Street, Bayham Place Estate garages and Richard Cobden School changing rooms on Plender St to provide two 4-5 storey blocks for a new Class D1 community centre with changing rooms, replacement Class A1 retail units and 31 'market' selfcontained private flats (12x1bed, 16x2bed and 3x3bed), plus new public open space and 2 disability parking spaces next to Bayham Place.			
Drawing Numbers: 634-AP-0001B, 0002B, 0100B, 0101B, 0105B, 0110B, 0111B, 0115B, 0150B, 0151B, 0200C, 0201C, 0210C, 0250B, 0300D, 0301D, 0310D, 0311C, 0320C, 0350C, 0351C, 0400, 401A; Design and Access Statement by Cartwright Pickard Architects, Viability Report and Affordable Housing Statement by Deloitte, Acoustic Report by Airo, Sunlight/Daylight Report by Deloitte, Arboricultural Report by Hallwood Associates, Sustainability Statement by MACE, Energy Statement by Stuart McCurry partners, Transport Statement by Curtins Consulting Ltd, Framework Travel Plan by Curtins Consulting Ltd, Construction Management Plan by MACE (all dated April 2013), GeoEnvironmental Detailed Desktop Study by Curtins Consulting Ltd (March 2013)			
RECOMMENDATION SUMMARY: Grant permission			
Applicant:		Agent:	
Camden Property Services c/o Agent		Turley Associates 25 Savile Row London W1S 2ES	

ANALYSIS INFORMATION

Land Use Details:			
	Use Class	Use Description	Floorspace (sqm)
Existing	A1 Shop		313
	D1 Non-Residential Institution		862
	D2 Assembly and Leisure		108

Proposed	<i>A1 Shop</i> <i>D1 Non-Residential Institution</i> <i>D2 Assembly and Leisure</i> <i>C3 Dwelling House</i>	228 714 70 3846
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Residential Use Details:										
	Residential Type	No. of Habitable Rooms per Unit								
		1	2	3	4	5	6	7	8	9+
Proposed	Affordable flats		5	5		4				
Proposed	Market flats		12	16	3					

Parking Details:		
	Parking Spaces (General)	Parking Spaces (Disabled)
Existing	32	0
Proposed	7	2

OFFICERS' REPORT

Reasons for Referral to Committee: This application is being reported to the Committee as it entails a Major development of more than 10 new dwellings and more than 1000 sqm of non-residential floorspace (Clause 3i).

This is a Council's own application, as submitted by the Property Services Department.

This application is the subject of a Planning Performance Agreement (PPA).

1. SITE

- 1.1 The scheme relates to 2 separate sites on adjoining streets in Camden Town: 30 Camden St and 67-72 Plender St with adjacent garages and changing rooms.
- 1.2 The Camden Street site contains a part 1 part 2 storey community centre building (Class D1), and to its south a row of 18 garages (plus 1 in the centre building). Adjoining to its east is Camden Studios, a terrace of 5 live/work artist studios with integral garages. Both were built as an integrated development in the 1960's. These are accessed via a pathway north of the centre which leads to a communal courtyard garden behind the centre. The site is surrounded by 4-5 storey postwar residential Council estate blocks to the south and east and by 2 Victorian blocks of flats to the north facing the street. Opposite (west) are the sports pitches relating to Richard Cobden primary school.
- 1.3 The Plender Street site consists of 3 separate areas. At the western end is a row of 5 single storey shops plus a 2 storey doctors surgery, built postwar; these abut on the western side a former public house (no 73), a 19th C building which has recently been converted to flats. At the junction of Plender and Camden Streets is a single storey changing room block used in association with the 4 sports pitches, used by pupils of the Richard Cobden School and, outside of school hours, by the general public. In between, and to the south of these 2 areas is a row of garages in Bayham Place facing the rear of Rainham House, and accessed directly off Plender St between the surgery and changing room buildings. To the west and north of this site are large postwar blocks residential Council estate blocks
- 1.4 The site of the changing rooms and the adjoining sports pitches are designated as Private Open Space in the LDF. The shops are not within a designated shopping parade or town centre. None of the sites lie within a conservation area nor do they contain any listed buildings.

2. THE PROPOSAL

Original

- 2.1 Redevelopment of 30 Camden Street to provide a 3-4 storey block for 14 affordable flats (4x1bed, 6x2bed and 4x3bed) plus 7 carspaces behind Camden Studios. Redevelopment of 67-72 Plender Street, Bayham Place Estate garages and Richard Cobden School changing rooms on Plender St to provide two 4-5 storey blocks for a new community centre with changing rooms, replacement retail units and 31 private flats (12x1bed, 16x2bed and 3x3bed), plus new public open space and 2 disability parking spaces next to Bayham Place.

Revisions

- 2.2 Revised community centre block on Plender St, improving the design of its rear elevation facing the sports pitches. Revised mix of flats in the affordable housing block on Camden St to ensure that a wheelchair accessible unit is fully provided. *(no reconsultation required due to the limited scale of the changes)*

3. RELEVANT HISTORY

- 3.1 None

4. CONSULTATIONS

Statutory Consultees

- 4.1 Transport for London (TfL) comment - as Camden Street is part of the TfL Road Network (TLRN). They request car-free housing, electric vehicle charging points, cycle parking, CMP, SMP, adequate protection of trees on Camden St, contribution of £18,000 to upgrade the 2 bus stops in Bayham St and Crowndale Rd. They consider that if their requests are met, the proposal will not have an unacceptable impact on the road network.

Local Groups

- 4.2 Camden Studios Residents Association (objection) - 3-4 storey block at Camden Street is overdominant and oppressive to residents, whereas current low rise 2 storey block provides relief, outlook and openness to west and south; scheme will go against original design principles of this estate and will hem in studios and create sense of enclosure; existing blocks in Camden St are orientated west-east at right angles to road whereby proposal with north-south alignment is at odds with this pattern and established character and sense of place; existing low rise building that relates to the studios behind should be retained for continuing balance; overlooking by windows in eastern elevation to communal garden and reduction of seclusion and privacy; no account taken of views expressed previously at earlier consultation group events, misleading statements in applicant's consultation report.
- 4.3 Bayham Place Tenants Association object- loss of light and privacy from Plender St blocks to Faversham House, leading to loss of quality of life and overcrowding; security must not worsen as security fencing has prevented any problems so far; loss of garages which have only just been refurbished, loss of parking spaces; electrical substation on ground floor never mentioned at previous consultation events which should be resisted;

Adjoining Occupiers

	Original
<i>Number of Letters Sent</i>	202
<i>Number of responses Received</i>	26
<i>Number in Support</i>	01
<i>Number of Objections</i>	25

- 4.4 8 residents of Camden Studios plus 12 others (not residents in area/borough) object - loss of outlook, openness, privacy and security to Studios; upsets established pattern of development (where 30 Camden St was built as an exhibition hall and one larger studio which were integrated in design and layout with other studios) and destroys historically interesting and attractive community; demolition of important modernist hall built in 1966; inadequate sewage/drainage system; reduction of width of entrance way to studios; loss of light and privacy to garden, affecting trees and ecology; construction noise and safety nuisance; shoe-horning modern housing into this community is against policy; over-concentration of flats in small area; development too high; facilities taken away from local residents and making area much denser; noise levels affecting new flats suggests that permission should be refused; token community consultation- studio residents did not support scheme in previous consultation events; no benefit to Studio residents whatsoever; Council's attitude to residents is lamentable.
- 4.5 4 tenants of surrounding Council estates (Trimdon, Norbiton, Westerham) and resident of Albert Street) object- flats should be no higher than 4 storeys; wide 5 storey high blocks will not enhance streetscape; overhanging balconies on Plender St will look unsightly and create health & safety and noise problems; loss of light and privacy to Trimdon, noise nuisance from community centre; already a problem with gang of youths congregating on Trimdon estate and community centre will add to problem by attracting more youths into estate when centre closes; traffic congestion and parking problems from new residents, visitors, servicing etc; drains cannot cope; will add to existing problems of traffic, pollution, noise and vandalism on Bayham Place; new open space will be ideal for drug addicts, drunks and loitering youths; loss of shops and surgery; area has enough blocks of flats and shops serve local community; Plender St blocks will destroy view of open space from Norbiton and make it look like a prison exercise yard, need nicer architecture; Council is not listening to residents despite meetings.
- 4.6 1 tenant of Landrake supports- scheme will provide a new community centre fit for purpose, with affordable and accessible services for local community; also new affordable housing which is much needed in borough.
- 4.7 Councillor Roger Robinson objects- area of Camden Studios was laid out to provide suitable light and openness for residents; a 4 storey block at western end would upset this concept and layout, be out of proportion, reduce openness, security, privacy and light, and hem in artists studios; plan would provide no benefit whatsoever.

5. POLICIES

Set out below are the LDF policies that the proposals have primarily been assessed against. However it should be noted that recommendations are based on assessment of the proposals against the development plan taken as a whole together with other material considerations.

5.1 LDF Core Strategy and Development Policies

- CS1 - Distribution of growth
- CS2 - Growth areas
- CS3 - Other highly accessible areas
- CS4 - Areas of more limited change
- CS5 - Managing the impact of growth and development
- CS6 - Providing quality homes
- CS7 - Promoting Camden's centres and shops
- CS8 - Successful & Inclusive Camden Economy
- CS10 - Supporting community facilities
- CS11 - Promoting sustainable and efficient travel
- CS13 - Tackling climate change
- CS14 - Promoting high quality places and conserving our heritage
- CS15 - Protecting and improving open spaces & biodiversity
- CS16 - Improving Camden's health and well-being
- CS17 - Making Camden a safer place
- CS18 - Dealing with waste
- CS19 - Delivering and monitoring the Core Strategy

- DP1 - Mixed use development
- DP2 - Making full use of Camden's capacity for housing
- DP3 - Contributions to supply of affordable housing
- DP5 - Housing size mix
- DP6 - Lifetime homes and wheelchair homes
- DP10 - Helping and promoting small shops
- DP12 - Supporting Strong Centres & managing the impact of food, drink, entertainment and other town centre uses
- DP15 - Community and leisure uses
- DP16 - Transport implications of development
- DP17 - Walking, cycling and public transport
- DP18 - Parking standards and the availability of car parking
- DP19 - Managing the impact of parking
- DP20 - Movement of goods and materials
- DP21 - Development connecting to the highway network
- DP22 - Sustainable design and construction
- DP23 - Water
- DP24 - Securing high quality design
- DP26 - Managing impact of development on occupiers and neighbours
- DP28 - Noise and vibration
- DP29 - Improving access
- DP31 - Provision of and improvements to public open space
- DP32 - Air quality and Camden's Clear Zone

Supplementary Planning Policies

5.2 Camden Planning Guidance

Other policies

5.3 National Planning Policy Framework 2012 The London Plan 2011

6. ASSESSMENT

- 6.1 The principal considerations material to the determination of this application are summarised as follows:
- Principle of development, including housing, retail, community facilities and open space
 - Residential standards
 - Bulk, layout and design
 - Trees and landscape
 - Sustainability
 - Neighbour amenity
 - Transport issues

Background

- 6.2 This scheme is submitted by Camden (Property Services) as part of the Council's overall Community Investment Programme (CIP). The CIP was agreed by Cabinet in December 2010 and brings together a wide range of work considering how best to use the Council's assets to improve, shape and transform key places and services within Camden. The vision of the CIP is to apply a strategic approach to enable the use of assets to support community investment. It aims to use disposals and rationalisation to create value which would contribute to the funding of the Council's investment priorities.
- 6.3 The overarching objectives for the application site have been identified as follows:
Camden Street- maximise the development potential of the site for social housing while taking account of the effect of massing of the development on residents of Camden Studios at the rear;
Plender Street- design a development which balances the needs for St Pancras Community Centre for adequate space to maintain its services with the requirement to reprovide an element of retail space for local people while maximising the residential development potential of this site to cross-subsidise the Camden St site.
- 6.4 The aim of this scheme, in the absence of any funding, is to use the receipt from sales of new private housing to cross-subsidise a replacement community centre, new affordable housing and new open space and other public realm improvements, in line with the above CIP vision. The 2 separate sites are conjoined into one application proposal so as to allow the relocation of the existing community centre onto another site in a better and more useful position.
- 6.5 The concept has been developed and changed over time since 2010 following extensive public consultation by Property Services and local stakeholders, including local residents and the community centre users; this has included community

workshops and a community 'visioning event' in early 2012 and a formal public consultation process by the applicant in summer 2012. A pre-application process was then initiated with the Planning Service in late 2012 and a Development Management Forum meeting took place in the community centre in February 2013. The scheme has evolved and been amended several times as a result, both before and after the application's submission, to reflect the concerns and comments made by both local people and officers.

Shadow Section 106 Agreement

- 6.6 The Recommendation is based on certain planning requirements ("Heads of Term") being secured in the event of approval. These Heads of Terms will usually be incorporated in a Section 106 Agreement. However in this case the applicant is the Council and as a matter of law the Council cannot enter into a Section 106 Agreement with itself.
- 6.7 Nevertheless it is still imperative that this application is dealt with in a way that is consistent with the way the Council would deal with non-Council applications. Therefore the Heads of Term would be embodied in a "Shadow Section 106 Agreement". This will be in the same form as a "standard" Section 106 agreement, incorporating the "usual" legal clauses and negotiated by separate lawyers within the Borough Solicitors Department representing the interests of the Council as landowner/ applicant and the Council as regulatory planning authority.
- 6.8 The Shadow Section 106 will *inter alia* include a provision requiring (i) that in the event of any disposal of the relevant land the Shadow Section 106 Terms will be included in the terms of the sale transfer and (ii) the purchaser will be formally required to enter into the Shadow Section 106 as owner of the land at the point of acquisition (and hence its terms will thereafter bind the site). As an additional safeguard some or all of the Heads of Term of the Shadow Section 106 will be duplicated as conditions on the planning permission.
- 6.9 Once the Shadow Section 106 Agreement has been finalised the Director (or relevant Assistant Director) of the applicant department will sign a letter formally undertaking on behalf of the department that its provisions will be complied with in the build out of the development and its subsequent operation.
- 6.10 The Shadow Section 106 Agreement and the Director/ Assistant Director's Undertaking of Compliance will be noted on the Planning Register (so the agreement is put on the record in the same way as a "standard" Section 106 Agreement) and compliance with the Shadow Section 106 will be tracked and monitored by the Planning Obligations Monitoring Officers in Development Management in the same way as a "standard" Section 106.

Proposal

- 6.11 The scheme involves 4 distinct and discrete elements as follows:
- 6.12 A) redevelopment of 30 Camden Street community centre and garages to provide a 3-4 storey block for 14 affordable flats plus 7 carspaces behind Camden Studios;

- 6.13 B) redevelopment of 67-72 Plender Street shops and surgery to provide a 4-5 storey block with flexible retail space on ground floor and 15 private flats above;
- 6.14 C) redevelopment of changing rooms on Plender Street (associated with Richard Cobden School) to provide a 5 storey block with new community centre and changing rooms on ground and 1st floors and 16 private flats above with external deck access on rear façade;
- 6.15 D) demolition of garages in Bayham Place and use of part of school playground and sports pitches for the creation of new public open space associated with new community centre, plus 2 disability parking spaces next to Bayham Place.
- 6.16 The scheme since submission has been slightly revised following concerns expressed by officers during the application process. Notably the community centre block on Plender St has been revised by improving the design of its rear elevation facing the sports pitches. Also the mix of flats in the affordable housing block on Camden St has been amended by changing a 4 person unit into a 2 person unit to ensure that a wheelchair accessible unit is fully provided.
- 6.17 The changed mix of uses between existing and proposed is shown (in square metres) in the following table-

Use	Existing	Proposed	Change
Housing-affordable	-	1267	+1267
Housing-market	-	2579	+2579
Retail (A1)	313	228	-85
Doctors surgery (D1)	146	0	-146
Community centre (D1)	716	714	-2
Changing rooms (D2)	108	70	-38
Designated Open Space	4261	4181	-80

Principle of development

- 6.18 The scheme is considered to comply with the overarching Core Strategy policies of CS1, CS4 and CS6 plus associated Development policies DP1 and DP2. Policy CS1 (Distribution of growth) establishes the overall approach to growth and development in the Borough, with this being focused in the most suitable locations and seeking to make the best use of Camden's limited land. The site adjoins an 'other highly accessible location' (policy CS3), ie. Camden Town centre, and is in an 'area of more limited change' (policy CS4) whereby major developments are expected to bring benefits such as provision of open space (addressing the loss of an area of existing private open space in a manner adequately satisfying policy CS15) and other community facilities. In this case, the scheme provides new publicly accessible open space and an improved community centre. In addition the

scheme provides new housing where none exists at present, with a mix of tenures and sizes, thus is in compliance with policy CS6 (Providing quality homes).

- 6.19 Policy DP1 (Mixed use development) builds on CS1 and states that the Council will require a mix of uses in development where appropriate in all parts of the borough. The proposal has a good mix of retail, residential and community uses which accord with more detailed provisions of other policies. Policy DP2 (housing supply), in support of CS6, promotes making full use of sites for increasing housing provision and encourages high density development. The density of the overall scheme here is considered appropriate, having regard to the London Plan matrix criteria and the densely built-up nature of the surrounding townscape. The proposed density of Camden St is approx 100 units per hectare (u/ha) and Plender St is 150 u/ha; these figures comply with the Plan's suggested range of 70-260 u/ha for this location with a PTAL rating of 6 in an urban setting.

Landuse - housing

- 6.20 The proposal involves the provision of 45 new housing units, split between 14 affordable and 31 market flats on 2 separate sites. This new housing is welcomed under policy DP2. According to the sliding scale of DP3, affordable housing (AH) is required on the basis of approx 50% of the total housing floorspace. The scheme provides 33% AH out of the total floorspace, on the basis that it is unviable to provide any more. The scheme received cabinet approval on the basis that the private flats cross-subsided the proposed community use and affordable housing and no additional funding has been made available. The viability assessment submitted by the applicant argues that the current scheme will only 'break even' with a deficit of £12,000, which should disappear later once market conditions improve in order to ensure the overall scheme is self-funding. In contrast, a policy compliant scheme involving more affordable housing would be unviable with a significant deficit of over £2million. It is noted from policy DP3 that financial viability considerations can be taken account of when assessing the acceptability of the proportion of affordable housing provision.
- 6.21 Officers have commissioned independent surveyors to assess the appraisal submitted by the applicant. They concur that the current scheme is deliverable and that an alternative policy-compliant scheme with more affordable housing would not be financially viable. Officers consider that this lower provision is acceptable in accordance with policy DP3 and in light of the fact that the scheme overall is community-led and delivers other priority uses such as an enhanced replacement community centre and new public open space. The affordable housing element will be secured via a shadow S106 legal agreement/condition.
- 6.22 The affordable housing target is split between a 60/40% social and intermediate housing mix. The proposed affordable element has 70% social and 30% shared ownership; the greater proportion of social rented housing is above the normal 60% level and is considered to be acceptable in this instance.
- 6.23 The mix of the 14 affordable units, as now revised, is- 5 x 1bed2p, 2 x 2bed3p, 3 x 2bed4p, 4 x 3bed5p. The Dwelling Size Priority Table in DP5 notes 3 bedroom large units to be 'high priority' whereas there are only 30% such units here. Nevertheless the mix is considered acceptable, as there are a total of 50% 4-5

person units suitable for families and as the mix is driven by Camden's identified housing need in this location. The intermediate (shared ownership) units would comprise 1 x 1bed, 2 x 2 bed and 1 x 3bed, and the social rent element would comprise 4 x 1bed, 3 x 2bed and 3 x 3bed, to be identified and secured on plan and by condition/S106.

- 6.24 The mix of the 31 market units is- 12 x 1bed2p, 9 x 2bed3p, 7 x 2bed4p, 3 x 3bed5p. Although there are very few large 3 bedroom units, there are over 50% of 'very high' priority 2 bedroom units in compliance with the Dwelling Size Priority Table, as well as overall 30% of 4-5 person units. Thus the private unit mix is also considered acceptable.

Residential standards

- 6.25 All units comply with Lifetime Homes standards. As revised, 4 units (10% of the total) are for wheelchair users, with one built out as such in the affordable block and 3 easily adaptable in the private block. All units are adequate in layout and floorspace, and have adequate levels of outlook and privacy. Most of the affordable units have access to private external amenity space in the form of a small garden or balcony.
- 6.26 A daylight/sunlight report has been prepared to analyse the acceptability of the proposed flats in accordance with recommendations of the BRE guidance (2011). It concludes that for the Camden St block, only 5 rooms do not meet the Average Daylight Factor (ADF) minima- these are 1 bedroom, 1 kitchen and 3 lounges, nearly all south facing and at ground level. However if one excludes the internal kitchens from the analysis of lounges, the living/dining areas for 2 of these rooms exceed the ADF standard. It is considered that these results are inevitable, given the constrained context of this block adjoining or facing other buildings, and the fact that 2 south-facing units on ground and 1st floors are in a rear corner and overshadowed by projecting balconies serving the flats above. There is also a need to balance the benefit arising from providing some outdoor amenity space with daylight requirements in this instance and in some cases the former aim outweighs the latter – also in this regard, the unit with lowest levels of daylight is however directly south-facing and thus liable to experience better sunlight levels than other units. It is considered that, in the circumstances that all other rooms in this large block are above the minimum standards, this level of internal amenity is acceptable.
- 6.27 With regard to Plender St, all units within the western block meet daylight standards; given the same orientation of the eastern unit, this should also benefit from the same or greater levels, given that it faces open pitches at the rear. Given the layout of the western block with internal corridor access along the rear, 8 x 1 bedroom flats will be north facing only with no access to sunshine. Again this is inevitable, given the constrained nature of the development, both physically and financially, and the need to minimise space devoted to service cores, and it is considered that this proportion of private flats (8 out of 31) is acceptable in this instance. It should be noted that London Plan (Housing SPG, Baseline 5.2.1) is particularly opposed to the provision of family sized units which have a single (north facing) aspect, whereas this scheme has only 1 bed units in this situation.

- 6.28 Three flats on each floor of the eastern block will have access to sunshine via windows set back within the open deck balconies. A suitable relationship to the sports pitches will be retained by 1.7m high obscure glazed screens, which will both prevent overlooking to users of the pitches and also allow light through to these windows.
- 6.29 An acoustic report has been submitted to assess whether the scheme complies with policy DP28 and those standards set out within the revoked (but not replaced in regard to detailed advice) PPG24 (Planning and Noise) regarding developments adjoining roads and railways. It shows that the noisiest facades are those facing Camden Street which are affected by noise from the road and sports pitches- these points (where the proposed eastern flank wall of Plender St block and the western front of 30 Camden St block will be) lie mostly within Noise Exposure Category C, whereby PPG24 recommended that developments should only be granted if conditions are placed to ensure appropriate noise protection. The report recommends therefore the use of mitigation measures such as facade sound insulation and double glazed windows to ensure WHO internal noise guidelines can be satisfied for all habitable rooms. The higher standards of insulation will be required for the eastern and southern facades of the eastern Plender St block and for all facades apart from the eastern one of 30 Camden St. A condition will be imposed details of these insulation measures to be carried out in line with recommendations of this report.

Landuse- retail

- 6.30 The existing doctor's surgery (Class D1) will not be replaced on site as it is being relocated to the nearby Crowndale Health Centre. Its loss is thus acceptable in compliance with policy DP15c.
- 6.31 The existing retail parade of 5 shops will be replaced by a flexible retail space which is capable of being subdivided into different areas and configurations. The modest loss of 85sqm is acceptable and complies with policy DP10 as the parade is not a designated centre, alternative provision is available in Camden High Street very nearby, and replacement of entire floorspace would not be viable in the context of the overall scheme creating other priority uses.

Landuse- community centre & changing rooms

- 6.32 The existing community centre (Class D1) is a former exhibition hall built in the 1970's for the adjoining artist studios. It is not purpose-built for the current use and thus has inherent problems of inflexibility and inaccessibility. It is poor quality in layout and structure and has high running and maintenance costs. Similarly the changing rooms (Class D2), used by players using the sports pitches outside school hours, are in a poor quality single storey building which has very basic facilities and is no longer fit for purpose.
- 6.33 The proposal involves replacing both of these buildings with a new purpose-built facility on the lower 2 floors of the eastern Plender Street building, which is fully accessible, efficient to run and flexible in layout so that it can accommodate different functions concurrently. It will enable a larger range of users and groups, as well as businesses. It will also be in a better location, adjoining both the sports

pitches and a new open space, the latter being managed by the centre. The improved changing rooms and associated facilities, both in terms of size and quality, should also lead to an improvement in the attractiveness and usage of the adjoining sports pitches. The location of the new centre here is a result of feedback from community workshop participants, whereby it was felt that a centre here would minimise impacts on local residents and would enable access to the open space for the drop-in children's centre. A central aim of this scheme has been to increase access to community facilities and to improve quality of life for local residents, given the deprived nature of the ward. The scheme has been worked up in detail with the St Pancras Community Association which is keen to consolidate and enhance its service offer.

- 6.34 The modest loss of 40sqm of community space is acceptable in the light of the overall significant improvement in quality of the replacement facility. This enhancement is welcomed in accordance with policies CS10 and DP15 and is supported by the Head of Sports and Physical Activity in the Culture and Environment Department.

Landuse- open space

- 6.35 The sports pitches and changing rooms plus an adjoining playground for the Richard Cobden School are designated as Private Open Space (POS) in the LDF. The scheme involves retaining the pitches (albeit slightly reducing their area in order to fit the new community centre on the site of the changing rooms) and taking over part of the school playground on Bayham Place (so that it is swapped with a public playground further south next to the school). The swaps of land have been developed in conjunction with Children Schools & Families Department to enable the provision of a new school nursery elsewhere and thus the scheme is fully supported by them. The site containing the changing rooms will be developed for the new centre and will be removed from the Open Space designation.
- 6.36 In order to compensate for this 'open space' loss, the proposal involves demolishing the garages along Bayham Place and creating a new communal open space (685sqm in area) located between the 2 new blocks and arranged as a long finger stretching southwards from Plender St and adjoining the west side of the sports pitches. It will contain a variety of functions, including an outdoor crèche garden connected to the community centre, playground, allotment planters and landscaped and seating areas, although its precise layout and design has not been finalised and will be reserved by condition. The open space will continue to be private in that it is managed by the Centre and with gated access off Plender St, but will be accessible to the public daily. Although details of precise opening times have yet to be agreed, it is anticipated that they would reflect the existing centre's opening time (at 9am) and the use of the sports pitches in evenings (until 9pm Mon-Fri and after 5pm at weekends). Details of opening, maintenance and management will be reserved by condition. The provision of this open space and its public access will be ensured by condition/S106 clause. The new space can be thus regarded as effectively new public open space, public in accessibility and open in character.
- 6.37 Part of the current designated POS has 476sqm actually occupied by buildings (changing rooms) and thus is not effectively usable or visible as open space in its

traditional sense. The new community centre takes over this area as well as a 163sqm strip of the sports pitches, so that a total of 639sqm of designated POS is lost. The new open space created in place of the garages and servicing areas will be 559sqm in area, to be designated as new POS. Thus the result will be a net loss of 80sqm designated open space.

- 6.38 Policy CS15 prohibits development on private open space, unless it is limited in scale, ancillary to the existing use and for which there is a demonstrable need. It also encourages the provision of new open space to tackle deficiencies. Nevertheless it is considered that there are exceptional reasons to allow this relatively modest loss here of designated POS. The current open space area to be lost, as explained above, is not all 'open' due to the existence of the changing room block. The new community garden created on the garage area represents an improvement in both quality and quantity of open space, in that it creates new actual open space, which is usable and accessible to everyone as a landscaped and attractive space and which is also open in character. In effect, the scheme provides an actual increase in 396sqm of accessible open space.
- 6.39 It is noted that the area of central Camden Town north of Plender Street currently suffers from public open space deficiency, according to the LDF (policy CS15), and thus this new open space will help address this imbalance. In conjunction with the improvements to sports facilities and community facilities, it is considered that this overall enhancement and increased size in real terms is welcome and that it outweighs the limited technical loss of designated 'open space'.

Demolition of buildings

- 6.40 No objection is raised to demolition of all the buildings as they are postwar in age and utilitarian in nature, are poor quality in aesthetic and functional terms, and have no architectural or historic merit.

Bulk/layout - Camden St

- 6.41 The proposed building is a part 3, part 4 storey building on the frontage with Camden Rd, where the lower 3 storey section that lies towards Kingston House to the north and projects forward to match that building's front building line; at the rear, there is a 3 storey wing abutting Camden Studios and a small single storey part in the rear NE corner, adjoining the Camden Studios amenity space. The main front 4 storey component of the building corresponds with the 4 storey height of the Victorian Terraces of Norbiton House and Kingston House to the north and the 4 storey height of the 1960's block of Merrivale House to the south.
- 6.42 The lower storey heights to the north and rear are necessitated by rights of light issues to Kingston House and Camden Studios and are a result of pre-application community discussions (see para 6.5 above). Due to the existence of 2 large and prominent plane trees on the back edge of the pavement, the 4 storey component is pulled back from the pavement edge to create individual front gardens and an entrance forecourt.
- 6.43 The creation of two components of differing heights and on differing planes aids in breaking up the visual mass of the built form. The new building will enhance the

streetscene by creating a new better quality built frontage that relate to the adjoining blocks to the north, compared to the current low rise centre which has a blank flank wall facing the street. Also the lower 3 storey block at the rear generally reflects the building line and form of the adjoining Studios terrace to the east.

Bulk/layout - Plender St

- 6.44 The Plender St redevelopment comprises two blocks- the eastern one north of the sports pitches is 5 storeys and the western one north of Faversham House is part 5 storey part 4 storeys. The latter 4 storey element is adjacent to the recently converted pub at 73 Plender St. This reduction to 4 storeys is necessitated by rights to light issues to both this property as well as to Faversham House to the south; however this stepdown in bulk and height is also useful in providing a transition in townscape terms to the lower Victorian property. The 5 storey height of the two larger buildings is considered to sit comfortably within the context of the varying heights of the immediate neighbourhood, eg. with the adjacent Council estate blocks such as Faversham to the south at 10 storeys and Trimden opposite at 4 storeys and also the 6 storey Victorian former industrial building, at the junction of Camden St and Plender St (40 Camden St). In contrast to the poor quality single storey structures on site, these new blocks will enhance the streetscene by reestablishing a defined built edge to Plender Street.
- 6.45 The upper 3 storeys of the eastern block have been set back to accommodate the crown spread of adjacent street trees

Design - Camden St

- 6.46 The 3 and 4 storey components and varied building line aid in breaking up the overall mass of the building. It is intended to accentuate this variation in scale and form by using different brick tones for the smaller and larger components to provide an increased a sense of visual richness in the elevational treatment. A further layer of visual interest is provided by the use of ceramic tiles around the entrance door and anodised aluminium bay windows to selected window openings. The bay window projections also provide a contextual response to the bay window projections of the neighbouring Kingston and Norbiton Houses. It is also proposed to use two different brick tones on the rear elevation to provide added visual interest and to break up the overall mass of the rear elevation.

Design - Plender St

- 6.47 The design of the elevations, especially the rear one, of the eastern block containing the community centre has been subject to much discussion and thus resulted in recent revisions. The aim is to establish an acceptable compromise between the applicant's desire to minimise overlooking from the deck access to the sports pitches used during school time and the officers' desire to provide an appropriate facade design in such a highly visible location in the public realm.
- 6.48 The front elevation of this eastern block comprises different treatments given to the community centre on the ground and first storeys with the remaining part of the ground and first floors forming primarily the entrance core to the flats above the community centre.

- 6.49 The differing treatments provide a means to clearly distinguish the community use of the building. This component of the building is expressed by a projecting frame clad with anodised aluminium panelling. The panel system is wrapped around half of the western flank wall of this building. Anodised aluminium is not the preferred finish for this element of the building as its metallic appearance is considered too 'industrial' for the community function of the building. It has been thus been agreed with the applicants that discussions will continue on the appropriate finish for this element which will be subject to detailed approval by condition. Within the framing element, the frontage to the community centre comprises of a curtain wall system with glazed and other panels. Again the design of this element will be subject to a condition requiring more detail. Although the principle of this design idiom is acceptable, the aim of conditions will be to secure an elevational treatment appropriate to its use as a community centre.
- 6.50 The residential component of the building is formed by a brick elevation and punched windows of varying proportions to provide a modulated rhythm across the façade. The entrance is marked with a recessed lobby lined with ceramic tiles
- 6.51 The rear of this building forms an important role in expressing its community use due to the prominence of this façade in views northeast across the sports pitches from Camden St. In the revised plans, the community centre is now differentiated from the upper floors' residential use by the use of a different tone of brick and a recessed band of contrasting material. The facade is also articulated by new high level strip windows and new signage will emphasise this use and improve its legibility. The overall effect is to provide an adequate visually 'solid' base to the whole block. At ground level, a hedge of climbing plants on the boundary fence will help soften the blank nature of the brick wall of this block.
- 6.52 The residential component of the building is primarily expressed through the deck access arrangement used at rear to provide access to the flats. The horizontal nature of the access galleries is now broken up by two brick columns which help to tie this element of the building into the brick façade. The intervening galleries have high obscured glass panels on balconies which project slightly from the façade to provide added profile.
- 6.53 The front elevation of the western block comprises at ground floor a zone for shopfronts (details to be submitted by individual tenants in due course) and the residential entrance which has a similar recessed and ceramic tile-lined lobby as the eastern building. The 5 storey component adopts similar window patterns to its neighbour. The adjoining 4 storey component is differentiated from the higher one having a differing pattern of window openings, the use of a different brick tone and cornice detail, along with a shadow gap between the larger and smaller buildings. The different treatment of the two components aids in providing greater visual variety and interest and also aids in the transition from the smaller existing converted pub to the larger buildings.
- 6.54 At the rear, a series of setback facades / planes and the use of a panel of textured feature brickwork on the large blank wall gives added visual interest.

Landscape/trees

- 6.55 The community centre and changing room blocks have mature plane trees (a total of 5) immediately adjoining them to the north, upon the public highway. The replacement buildings on these 2 sites have thus been set back to ensure their retention, with further setbacks at upper floor levels to ensure they the tree crowns are not harmfully affected. The setbacks and the suggested pruning of crowns are considered acceptable. There are some encroachments into the root protection areas of the plane trees and the applicant confirms that suitable foundation measures will be used to protect them. Conditions will be imposed to ensure satisfactory foundation details and construction methods.
- 6.56 Green/brown roofs would be preferred on the 3 available remaining roofs which are not occupied by solar panels. The applicant has deemed these too expensive given the limited viability of the overall project. However it is noted that the scheme will provide approx. 685sqm of new open space which is soft landscape or permeable surfaces, which is a net gain in contrast to the existing hard surfaced areas in this area of playground, forecourts, driveways and garage buildings. Thus there will be considerable improvements in biodiversity and sustainable drainage overall. It is considered that the lack of green roofs is acceptable in these circumstances. In addition, the buildings will contain appropriate bird and bat bricks, details reserved by condition.
- 6.57 The landscaping strategy includes the following- at Plender St, a new open space with a variety of planted, hard and soft landscaped areas; at Camden St, areas of individual gardens at front and rear of the housing block, a setback communal forecourt, and strips of tree planting adjoining the parking area at the rear. The existing courtyard of Camden Studios and its front entrance passage will be untouched. Details of landscaping will be reserved by condition.

Sustainability

- 6.58 An energy strategy report and a sustainability statement have been submitted. The former confirms that thermal efficiency measures and use of renewable energy facilities will aim to reduce CO2 emissions as far as possible in line with CPG targets, including 20% from renewable energy. Photovoltaic panels are used on roofs of all blocks, being the most viable and feasible here at a minimum cost.
- 6.59 The Plender St scheme achieves an overall saving of 14% compared to the 2010 Building Regulation baseline, with 8% contributed by renewables. It should be noted that this low result is due to the community centre not being able to incorporate additional renewables and due to the unknown nature of the tenants' fitouts for the shop units. In contrast, the dwellings in themselves here achieve a 30% reduction alone with 23.7% of this resulting from the PV panels. The Camden St scheme, being all housing, achieves an overall saving of 30.5%, with 23.7% of this resulting from the PV panels, which again exceeds the 20% target.
- 6.60 The sustainability statement confirms that the scheme generally meets the more stringent targets now required by policy CS13 for proposed developments in 2013. The housing elements meet the Code for Sustainable Homes' target of 'Level 4' (ie. above 68%) and the Class D1/D2 elements meet the BREEAM target of 'Very Good'. The retail element has not been assessed on account of its small size. Sub targets of 50% for the energy, water and materials categories are all exceeded for

both private and affordable housing elements. A post-construction review, ensuring such targets are met, and the provision of associated renewable energy facilities will be secured by condition/S106 clause.

Neighbour amenity

- 6.61 A comprehensive daylight and sunlight study has been prepared to assess the impact on all the surrounding buildings and estate blocks (12 in total). It concludes that 98% of all windows meet relevant criteria on daylight using the Vertical Sky Component (VSC) and No Sky Line (NSL) analyses. It should be noted that all windows of Camden Studios are not significantly affected and all meet the relevant tests.
- 6.62 The sole exceptions are as follows- 3 kitchen windows on the NE corner of Faversham House at 1st-3rd floors fail VSC, but they meet NSL criteria. The ground floor lounge east facing windows of 73 Plender St fail VSC, but these are secondary to the main windows facing west and thus the room should have overall good lighting. The north facing windows in Merrivale facing the new Camden St block, ie. 13 kitchens at ground, 1st and 2nd floors, all fail VSC; however these failures are due to the overhanging balconies so that when the daylight test is repeated to exclude them, the results are positive. It is considered that these marginal technical failures are acceptable in the overall context of the scheme and its surroundings.
- 6.63 All surrounding windows meet the sunlight standards. In addition, a sun-on-ground study of the courtyard garden of Camden Studios, to the east of the new Camden St block, shows that additional overshadowing of this is minimal compared to the existing situation and that it complies with BRE recommendations.
- 6.64 In terms of outlook, the Faversham House flats have non-habitable rooms or small kitchens facing the new Plender St eastern block, while their primary habitable rooms face south. Thus it is considered that outlook would not be affected. The layout and massing of the Camden St block has been carefully designed with the interests of Camden Studio residents in mind so as not to harm their amenities unduly. Thus the block is set back considerably from both the Studios to the east and the windows of Kingston House to the north so as to maintain sightlines and light angles and only a single storey element directly abuts the courtyard garden. It is considered that the new block, with its variety of stepped levels, will not result in loss of outlook or an increased sense of enclosure to the various north and south facing windows of the Studios nor to its courtyard garden.
- 6.65 In terms of privacy, the new southern facade of the Camden St block will be 15m away from flats in Merrivale to the south, which have north facing small kitchens on all floors and bedrooms on the 3rd floor. This is less than the 18m distance recommended by CPG to prevent overlooking. It is thus recommended that a condition be placed to ensure that the proposed south-facing windows here (which are secondary ones to the lounges) are obscure glazed at 2nd and 3rd floors to maintain privacy of the 3rd floor bedrooms of Merrivale.
- 6.66 The proposed windows of the western Plender St block will be 18-20m away from kitchens on the north side of Faversham House which is acceptable. However a

window with balcony on each floor at the eastern end of this block will be 16m away from the kitchens on the NE corner of Faversham House. Nevertheless this should not cause a serious loss of amenity as the affected kitchen is not a large habitable room and as there would be only indirect views of a corner due to the angle involved.

- 6.67 There are no direct views possible from the Camden St block into windows in Camden Studios as there are no direct sightlines into their solely north or south facing windows. Although some views are possible of the courtyard garden from east facing bedroom windows at 1st and 2nd floors, these are 15m away and partially obscured by the intervening flat roof of the single storey rear wing, so that only a partial 5m long strip of garden at its entrance is directly within the 18m 'overlooking zone'. A ground floor flank window directly abuts the courtyard at the rear, and can be obscure glazed by condition so that no undue harm could arise. This is considered acceptable in the context of the size of the overall garden, especially as it is already overlooked by other existing windows of Kingston House. A condition will also be imposed to ensure the flat roofs on all blocks are not used as amenity roof terraces and are only accessible for maintenance purposes.
- 6.68 Plant rooms are proposed in the ground floors of all blocks and it is expected that these will comply with the Council's standard noise conditions of 5 decibels below background noise levels in order to maintain neighbour amenity. A condition will be imposed to ensure all plant meets Council's noise standards.

Transport

- 6.69 The Camden St site contains 19 garages which will be demolished and replaced by 7 parking bays. The 13 garages in Bayham Place will be demolished and replaced (in part) by 2 disabled bays. This will result in the net loss of 23 spaces overall between the 2 sites. However the applicant has confirmed that many of these garages are vacant (eg. 4 on Bayham Place and 8 on Camden St) while the remaining tenanted ones will be transferred elsewhere on the surrounding estates as follows. The 7 from Bayham Place would move to refurbished empty garages at Landrake, of which 3 are under Camden Studios, and the other 4 in the row to the south of the Merrivale block. The tenants of the 11 garages at Camden Street will have the opportunity to move to vacant carparking spaces within the College place estate, with 7 returning to the re-provided spaces at the Camden Street site. The residual 4 can stay at College Place. Thus there should be no displacement of existing tenants' carparking on the surrounding streets and thus the scheme will have no net effect on parking stress in the existing CPZ. A condition will ensure that such replacement parking provision onsite is implemented.
- 6.70 The new flats will be car-free, to be secured by condition/S106, to ensure there is no further impact on the CPZ. This accords with policies CS11 and DP18.
- 6.71 A draft Travel Plan has been provided, which is acceptable in principle at this stage, but needs to be submitted in a more detailed form as part of a condition/S106 clause. The consequential reduction in garage parking spaces, car free housing and sustainable transport measures to be delivered by the condition / S106 clauses are considered to mitigate a negligible impact in regard to increased vehicle trips associated with the proposed development.

- 6.72 Cycle parking is provided in the form of 52 spaces in 3 covered and secure stores within the new buildings at ground level. This is acceptable in principle, although more detail is required for the layout arrangements and type of racks used and this will be secured by condition. The condition will also require additional cycle stands for use by visitors to the community centre and sports pitches; it is suggested that these could be sited on the forecourt of the centre's frontage.
- 6.73 A draft Construction Management Plan (CMP) has been submitted which, although adequate at this stage, needs to be worked up in more detail and approved by both Camden and TfL. It will need to make reference to air quality monitoring and appropriate mitigation measures throughout the demolition and construction process and also will need to refer to the establishment of a 'community working group' to enable regular liaison between local people and contractors throughout the development process. These requirements are necessary to ensure adequate protection of neighbour amenity, given the close proximity of residents surrounding the new Camden St block. This will be secured by condition/S106 clause.
- 6.74 The new retail units will continue to be serviced from Plender St which is acceptable. However a Servicing Management Plan (SMP) is required for both residential and commercial units as requested by TfL and will be secured by condition/S106 clause. The entrance to the new open space will be designed to allow retention of existing emergency access through to Bayham Place.
- 6.75 The surrounding pavements on both road frontages will need to be reconstructed following redevelopment, as well as rationalising or relocating the existing street furniture. An estimate is currently being prepared by the Highway Engineers and a financial contribution will be secured by condition/S106.
- 6.76 Transport for London (TfL) have commented, as Camden Street is part of their Road Network, and consider that if their requests are met, the proposal will not have an unacceptable impact on the road network. In particular they request a contribution of £18,000 to upgrade the 2 bus stops in Bayham St and Crowndale Rd in the vicinity of the site, due to an increased generation of residents in the area needing public transport. This public realm improvement is justified by the scale of the scheme and has been accepted by the applicant, also to be secured by condition/S106.

Other issues

- 6.77 Adequate refuse storage is provided in size and location.
- 6.78 The scheme has been reviewed and accepted by the Crime Prevention Design Advisor as it is designed to a Secured by Design standard. In particular the entrances to both the parking area at Camden Street and the open space at Plender St will be gated. The open space will be managed by the adjoining community centre and will have natural surveillance by the centre and the flats above both Plender St blocks. The existing entrance passageway on the north side of 30 Camden Street, which is a semi-private accessway to Camden Studios behind, will be unaffected in its width and location and indeed will be enhanced in its security by having windows in the new block providing natural surveillance.

Thus the scheme is not considered to give rise to any security issues, such as those referred to in section 4 above.

- 6.79 The CSF Department have confirmed that there is sufficient capacity in local schools to accommodate the anticipated generation of new children by the proposed housing here. Thus no financial contributions for educational facilities are required in this instance.
- 6.80 In terms of contributions to public open space facilities, there is a net gain in new accessible public open space on site (as opposed to designated POS); however there is a small shortfall in terms of total onsite open space provision as required by the CPG6 formulae based on new bedspaces. It is calculated that a financial contribution of £2162 will be required.
- 6.81 Regeneration officers have recommended that contributions are made to maximise the opportunities for local residents and businesses. These include-
- a) The contractor is required to work to a target of 20% local recruitment;
 - b) The contractor advertises all construction vacancies and work placement opportunities exclusively with the Kings Cross Construction Skills Centre for a period of 1 week before marketing more widely;
 - c) The contractor provides a specified number (to be agreed) of work placement opportunities of not less than 2 weeks each, to be undertaken over the course of the development, to be recruited through the Council's Kings Cross Construction Skills Centre;
 - d) As the build costs of the scheme exceed 3 million, the contractor should recruit 1 construction apprentice per £3million of build costs, and pay the council a support fee of £1,500 per apprentice. Recruitment of construction apprentices should be conducted through the Council's Kings Cross Construction Skills Centre;
 - e) As the value of the scheme exceeds £1million, the contractor must also sign up to the Camden Local Procurement Code.
- The above clauses will be secured by condition/S106.
- 6.82 Contaminated land investigations are recommended which will be secured by condition.
- 6.83 The proposal will be liable for the Mayor of London's Community Infrastructure Levy (CIL) as the additional floorspace exceeds 100sqm GIA or one unit of residential accommodation. The scheme will be charged at a rate of £50 per m², taking account of the social housing and community uses which are exempt from such charges. It is estimated provisionally that the charge for this scheme is likely to be £128,950 (£50 x GIA (per sqm) for new private housing). The CIL charge will be collected by Camden after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index. An informative will be attached advising the applicant of the CIL requirement, although acknowledging that they are already aware of it having completed the Planning Application Additional Information Requirement form.

7. CONCLUSION

- 7.1 The proposed development is a key proposal in the Council's Community Investment Programme and seeks to deliver a comprehensive regeneration project which both replaces an existing community centre with a significantly improved facility and also provides new publicly accessible open space and new affordable housing. Although the amount of affordable housing is below policy targets, this is owing to the existing onsite characteristics and the financial viability of the scheme. The scheme also maximises the development potential of the site by providing new market housing which is welcome.
- 7.2 The tenure, mix and standards of accommodation of the housing proposed are acceptable. The slight reduction of retail space is acceptable given the proximity of nearby Camden town centre and the lack of a retail designation on the site. The new community centre and associated sports facility, in terms of its location, size, layout and design, will ensure that its current service provision is significantly enhanced. The current Private Open Space designation is reduced in quantity but this is outweighed by enhancement in its quality by creating new landscaped open space which is publicly accessible and visually open.
- 7.3 The massing, height, layout and detailed design are acceptable in the context of the sites' surroundings and the new buildings should enhance the streetscene. The scheme retains important street trees and provides new landscape opportunities. The scheme is designed to be as sustainable as possible.
- 7.4 The scheme should not materially harm neighbouring amenity in terms of outlook, light, privacy or noise. The scheme will not harm local parking conditions as the new flats will be designated 'car-free' and as existing occupied parking spaces onsite will be relocated around the adjoining estates.
- 7.5 Planning permission is recommended subject to conditions and a shadow S106 Legal Agreement, covering the heads of terms outlined below. A final condition will be added to explain that, in the event of the Council disposing of its interest in the land prior to implementation and/or occupation of the scheme, certain conditions become heads of terms in a new S106 legal agreement.

Shadow S106 Heads of Terms

- 7.6 This should be read in conjunction with the commentary earlier in section 6 of this report (paragraphs 6.6-6.10). The wording of the associated conditions are in the process of being worked up by officers and the Legal Division, hence at this point in time they are not included in the draft decision's list of conditions. A full list of heads of terms are as follows:
- Implementation of affordable housing, including identification of social rent and intermediate tenure properties;
 - Implementation of community centre and open space;
 - Public access on daily basis to open space;
 - Car-free housing;
 - Highways works contribution for repaving footways within the vicinity of the site;
 - Public realm contribution of £18,000 for improvements to 2 bus stops in Bayham St and Crowndale Rd;
 - Travel Plan;

- Implementation of new parking spaces for use by other tenants only;
- Construction Management Plan;
- Servicing Management Plan;
- Post-construction review to achieve Code for Sustainable Homes and BREEAM targets (except for retail units);
- Renewable energy facilities;
- Public open space contribution of £2162;
- Recruitment, apprenticeship and procurement measures as outlined in para 6.81 above.

8. LEGAL COMMENTS

- 8.1 Members are referred to the note from the Legal Division at the start of the Agenda
- 8.2 In addition, specific reference should be made to the Shadow Section 106 Agreement part of the report (paragraphs 6.6 - 6.10 above).